

G A R V E Y S C H U B E R T B A R E R

February 3, 2003

Via Hand Delivery

RECEIVED

Marlene H. Dortch, Secretary
Federal Communications Commission
c/o Vistrionix, Inc.
236 Massachusetts Avenue, NE, Suite 110
Washington, DC 20002

FEB - 3 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Meredith Corporation
WHNS and WHNS-DT, Asheville, North Carolina
MB Docket No. 02-363
RM - 10604

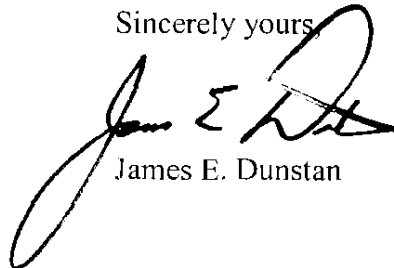
Dear Ms. Dortch:

Transmitted herewith, on behalf of Meredith Corporation are an original and four copies of its "Reply Comments of Meredith Corporation" in connection with the above-referenced proceeding.

Additional copies of the pleading are also being delivered, either by hand or by U.S. first-class mail, to each of those listed on the attached Certificate of Service.

If there are any questions concerning this matter, kindly communicate directly with this office.

Sincerely yours,



James E. Dunstan

JED:cl
Enclosure

No. of Copies rec'd 0+4
List ARCADE

Before The
Federal Communications Commission
Washington, D C 20554

RECEIVED

FEE - 3 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter Of)	
)	
Amendment of Section 73.606(b))	MB Docket No. 02-363
Table of Allotments)	RM - 10604
Television Broadcast Stations; and 73.622(b),)	
Table of Allotments, Digital Broadcast)	
Television Stations)	
(Asheville, North Carolina and)	
Greenville, South Carolina))	

TO: The Chief, Video Division
Media Bureau

REPLY COMMENTS OF MEREDITH CORPORATION

Meredith Corporation (“Meredith”), licensee of paired Television Broadcast Stations WHNS and WHNS-DT, Asheville, North Carolina, by its attorneys and pursuant to Section 1.420 of the Commission’s rules and regulations, 47 C.F.R. § 1.420, files these Reply Comments in the above-referenced proceeding

On January 16, 2003, Meredith filed comments in support of the *Notice of Proposed Rulemaking* (“*NPRM*”),¹ and reiterated its commitment to operating WHNS as a Greenville station from its existing facilities if the Bureau were to adopt the proposal set forth in the *NPRM*. Meredith has received service of no other comments filed in this proceeding, and a review of the FCC’s Electronic Comment Filing System (ECFS) reveals no other comments than those filed by Meredith. As such, the Bureau may conclude that the proposed city of license change stands unopposed

¹ DA 02-3189, released November 25, 2002

Further, the lack of any opposition from any other broadcaster in the market, combined with Meredith's continued interest in the change, should dispel any lingering concern the Bureau might have that the change would not result in the most beneficial allocation of channels within the market. Indeed, as the Commission noted in 1989, it is stations that are in the very best position to determine how to best serve their audiences.² Meredith has determined that it can best serve the Greenville-Spartanburg-Asheville-Anderson television market as a station licensed to Greenville, South Carolina, and no one has tiled any comments to the contrary

Meredith submits that it has met its burden of showing why the change in city of license is exactly the type of change that "would result in a preferential arrangement of allotments," and generally would advance the "fair, efficient and equitable distribution of radio service."⁴ It has shown how the Greenville portion of the market has grown steadily over the last decade, and how the majority of local advertising dollars are centered in Greenville, which has fewer stations licensed to it (three), than does Asheville (four). Because Asheville will remain with three **full** service stations licensed to it, and Meredith will not change its broadcast facilities, there is no actual removal of service from the area, and even if there were, the change would not remove either first or second service to the community. There are no negative aspects to this change which should prompt any concern on the part of the Bureau.

² *Modification of FM and TV Authorizations*, 4 FCC Rcd 4870, 4873 (1989); *aff'd Modification of FM and TV Authorizations (Reconsideration)*, 5 FCC Rcd 7094 (1990).

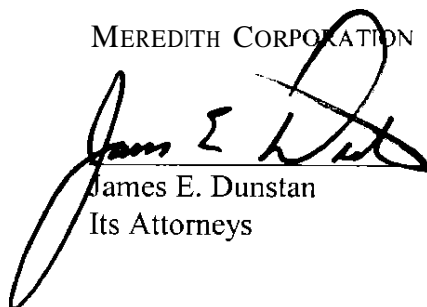
³ See 4 FCC Rcd at 4873

⁴ *Id.* at 4874.

WHEREFORE, Meredith respectfully requests that the Commission move with all haste to issue an order amending the table of allotments in Section 73.606(b) and 73.622(b) to delete analog Channel 21 and digital Channel 57 from Asheville, North Carolina, add those channels to Greenville, South Carolina, and modify Meredith's licenses for WHNS to specify Greenville as the city of license for WHNS and WHNS-DT.

Respectfully submitted,

MEREDITH CORPORATION

A handwritten signature in black ink, appearing to read "James E. Dunstan", is written over a horizontal line. The signature is stylized with a large, looping initial "J".

James E. Dunstan
Its Attorneys

GARVEY SCHUBERT BARER
1000 Potomac Street N.W., Fifth Floor
Washington, D.C. 20007
202-965-7880

February 3, 2003

CERTIFICATE OF SERVICE

The undersigned, an employee of Garvey Schubert Barer, hereby certifies that the foregoing document was mailed this date by First Class U.S. Mail, postage prepaid, or was hand-delivered*, to the following:

Barbara Kreisman, Division Chief *
Video Division
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554


Cindy Lloyd

February 3, 2003